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May 9, 2002

27-19071.001

BROWN AND  
CALDWELL

Mr. Donald Webster  
Project Manager, RCRA Programs Branch  
USEPA Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

RE: USEPA Request for a Corrective Measures Study (CMS) Work Plan  
Grenada Manufacturing, LLC  
EPA ID No. MSD 007 037 278

Dear Mr. Webster:

The purpose of this letter is to respond to the USEPA's November 26, 2001 letter addressed to Mr. Don Williams at the referenced site. On behalf of Grenada Manufacturing and in conjunction with ArvinMeritor, Brown and Caldwell (BC) will submit a CMS Work Plan by the June 30, 2002 deadline indicated in your letter.

It is our understanding that if a CMS is implemented for this site, the facility will not be required to submit an Interim Measures Study Report. However, Interim Measures Progress Reports will continue to be submitted semiannually, in June and December.

In the December 2001 Interim Measures Progress Report, a tentative construction date of June 2002 was anticipated for the permeable reactive barrier. At this time, various design information is still being collected to allow completion of the design task. This information includes conduct of a second treatability study for the iron filings, review of potential target cleanup levels, input from the Corps of Engineers regarding wetlands delineation, collection of geotechnical data, and completion of related design documents (e.g., technical specifications, Construction Quality Assurance Plan (CQAP), and the Performance Monitoring Plan). As a result, construction is expected to begin in late summer (i.e., August) 2002.

According to publication EPA530-K-02-0171, *Introduction to: RCRA Corrective Action*, updated October 2001, it is our understanding that the CMS Report may be due six (6) to nine (9) months after the CMS Work Plan has been approved by EPA. We would request that a due date for submission of a CMS Report be made somewhat flexible so that performance monitoring of the Interim Measures could be incorporated into the study. As appropriate, the need for additional source control measures at the site will be considered during the CMS process.

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We hope that this letter has been responsive to your needs. Please feel free to contact me at (615) 250-1241 if you have any questions.

Sincerely,

BROWN AND CALDWELL



Dale Showers, P.E.  
Project Manager  
Design & Solid Waste

cc: Louis Crawford, MDEQ  
Don Williams, Grenada Manufacturing  
John Bozick, ArvinMeritor  
Robert Ash IV, P.E., Brown and Caldwell